

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**In re: BRIDGESTONE/FIRESTONE, INC.,  
TIRES PRODUCTS LIABILITY LITIGATION**

) **Master File No. IP 00-9373-C-B/S**  
) **MDL NO. 1373**

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**THIS DOCUMENT RELATES TO ALL  
ACTIONS**

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**ENTRY FOR MARCH 8, 2002**

The parties appeared, by counsel, this date for a telephonic status conference regarding discovery in the Venezuelan cases, during which the following was discussed:

1. The parties have resolved all outstanding issues regarding the medical authorizations plaintiffs will execute, except for the appropriate time frame for the authorizations. The magistrate judge determines that the defendants are entitled to obtain medical records for a the period of ten years prior to the date of the accident at issue up to the present,<sup>1</sup> or indeed up until the date of trial if permanent injuries are claimed.<sup>2</sup> The defendants will prepare the releases and send them to the plaintiffs' attorneys by Monday, March 11, 2002; the executed releases shall be provided to the defendants no later than March 28, 2002. The parties will make arrangements for the executed releases to be delivered to the defendants in Venezuela.
2. The parties reported as to the status of depositions in the Venezuelan cases and the fact that the defendants still have a large number of depositions that they wish to schedule. The magistrate judge orders the following:
  - a. By the end of business today, the defendants shall provide the plaintiffs with the specific names of the persons they wish to depose;
  - b. The parties shall meet and confer during the week of March 11<sup>th</sup> and shall schedule

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<sup>1</sup>The defendants must submit their requests for records to each plaintiff's medical providers prior to the discovery deadline in the plaintiff's case.

<sup>2</sup>Obviously, if a plaintiff has a specific condition that makes older medical records relevant, the defendants will be entitled to a release for those older records as well.

all remaining Venezuelan depositions, with the exception of police officers and other public safety officers, the availability of which is controlled by the appropriate Venezuelan authorities, in all Venezuelan cases in which the plaintiff is not represented by Victor Diaz. The parties shall report to the magistrate judge regarding their efforts by March 15, 2002, at noon.

c. If counsel are unsuccessful in arriving at a comprehensive schedule of all “non-Diaz” Venezuelan cases, they shall appear, in person, in the magistrate judge’s chambers **on Wednesday, March 20, 2002, at 9:00 a.m.** with their calendars and the schedules of the deponents in order to complete the schedule.

3. Once the “non-Diaz” depositions are scheduled, the defendants and Mr. Diaz shall confer and prepare a schedule of all of the requested depositions in Mr. Diaz’s cases, again with the exception of public safety officers.

4. In all cases, the magistrate judge again urges the defendants to consider seriously whether they really wish to take every deposition they have requested.

ENTERED this \_\_\_\_\_ day of March 2002.

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V. Sue Shields  
United States Magistrate Judge  
Southern District of Indiana

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